

STATE OF INDIANA ) IN THE ALLEN SUPERIOR COURT  
 ) SS:  
COUNTY OF ALLEN ) CAUSE NO. \_\_\_\_\_  
  
ERICA WISDOM, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
TRI-STATE MEDICAL GROUP, LLC, )  
 )  
Defendant. )

**COMPLAINT**

Plaintiff alleges against Defendant that:

1. The Plaintiff is Erica Wisdom, an African-American/black female who claims, pursuant to 42 U.S.C. § 1981, that she was discriminated against and discharged on account of her race and color and that Defendant treated her differently with respect to the contractual benefits of her employment than similarly situated Caucasian individuals.
2. Defendant Tri-State Medical Group, LLC is an employer for purposes for 42 U.S.C. § 1981 and is obligated under that statute to treat minorities and Caucasians the same with respect to the benefits and privileges of employment.
3. Plaintiff was hired by the Defendant on or about December 2, 2015, and she was terminated by Defendant on or about March 15, 2017.
4. During her employment at Defendant, Plaintiff was the only African-American/black; Plaintiff worked in billing and coding; she was excluded from participating in the same privileges and benefits of employment as similarly situated Caucasians; she was falsely

and discriminatorily labeled as “too argumentative” which was a pre-textual and false reason for disciplining and terminating her; she suffered disparate treatment compared to Caucasian employees, particularly when a “new supervisor” was installed. Caucasian billing/coding specialist were treated better than the Plaintiff with respect to the terms, conditions, benefits, and privileges of their employment.

5. The actions of the Defendant were intentional and in reckless disregard of Plaintiff's federally protected civil rights under § 1981.
6. Plaintiff suffered a loss of her job and job related benefits including income; she experienced mental anguish, emotional distress, humiliation, embarrassment, inconvenience, and other damages and injuries; because of the intentional nature of the actions of the Defendant which were in reckless disregard of Plaintiff's federally protected civil rights, Plaintiff seeks punitive damages as well as compensatory damages.

WHEREFORE, Plaintiff prays for judgment against the Defendant, for compensatory damages, financial damages, punitive damages, reasonable attorney's fees and costs, and for all just and proper relief in the premises.

**JURY DEMAND**

Pursuant to Rule 38 of the Indiana Rules of Trial Procedure, Plaintiff demands a trial by jury in this action.

Respectfully submitted,

**CHRISTOPHER C. MYERS & ASSOCIATES**

/s/Christopher C. Myers

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